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NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

5:08CR 347

UNITED STATES OF AMERICA,

) CASE NO.

Plaintiff,

) JUDGE

JUDGE GAUGHAN

v.

)

KENNETH D. SALTZ, JR.,

) I N D I C T M E N T

Defendant.

) Violations: Title 29,

) United States Code, Sections

) 439(c) and 501(c).

The Grand Jury charges:

GENERAL ALLEGATIONS

1. At all times material to this Indictment, the United Steelworkers of America, AFL-CIO (hereinafter "Steelworkers"), was a labor organization as defined in Sections 3(i) and 3(j) of the Labor-Management Reporting and Disclosure Act.

2. At all times material to this Indictment, the defendant, KENNETH D. SALTZ, JR., was the president of the Steelworkers Local Union 1124 in Massillon, Ohio.

3. Steelworkers Local Union 1124 (hereinafter "the Local") maintained checking account number XXXXX0122 at JP Morgan Chase Bank, formerly doing business as Bank One, N.A. (Bank One), a

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financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC). As president of the Local, the defendant was an authorized signatory on Bank One account number XXXXX0122. All checks written on this account required three signatures of the four Local officers, that of the president, vice president, treasurer, and/or financial secretary.

4. Steelworkers Local Union 1124 also maintained a union Visa credit card, for the purpose of purchasing supplies for the Local.

COUNT 1

(Embezzlement by Officer of a Labor Organization)

Beginning on or about May 11, 2006, and continuing through on or about August 18, 2006, in the Northern District of Ohio, Eastern Division, the defendant, KENNETH D. SALTZ, JR., while employed as an officer of a labor organization, did knowingly embezzle, steal, and unlawfully and willfully abstract and convert to his own use and the use of others, money, funds, and assets of the labor organization, to-wit: KENNETH D. SALTZ, JR., while employed as the president of United Steelworkers Local 1124 in Massillon, Ohio, embezzled and stole approximately \$15,809.03 from United Steelworkers Local 1124, by writing and negotiating approximately 55 unauthorized union checks with a total value of approximately \$14,042.00, payable to himself; and by making approximately \$1,767.03 in charges on the United Steelworkers

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Local 1124 Visa credit card, all with no benefit to the union.

All in violation of Title 29, United States Code, Section 501(c).

COUNT 2

(False Entries on Required Labor Organization Records)

The Grand Jury further charges:

Beginning on or about May 11, 2006, and continuing through on or about August 18, 2006, in the Northern District of Ohio, Eastern Division, the defendant, KENNETH D. SALTZ, JR., did willfully make a false entry in and did willfully conceal and withhold records, reports, and statements required to be kept under the Labor-Management Reporting and Disclosure Act and under Article VIII, Section 5, of the United Steelworkers labor organization constitution, to-wit: with the intent to conceal the true nature of unauthorized payments made to himself, KENNETH D. SALTZ, JR., did forge the signature of the United Steelworkers Local Union 1124 vice president on approximately 55 Local 1124 checks made payable to KENNETH D. SALTZ, JR.

All in violation of Title 29, United States Code, Section 439(c).

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.